SUMMARY OF THE ACCREDITATION PROCESS COMMITTEE MEETING OCTOBER 4, 2000

The Accreditation Process Committee of the National Environmental Laboratory Accreditation Conference (NELAC) met by teleconference on Wednesday October 4, 2000, at 1 p.m. Eastern Daylight Time (EDT). The meeting was led by its chair, Ms. Janet Cruse of the Illinois Environmental Protection Agency (IL EPA). A list of action items is given in Attachment A. A list of participants is given in Attachment B. *The purpose of the meeting was to discuss proposed language from the State of California concerning the accreditation procedures and requirements for mobile laboratories.*

INTRODUCTION

Ms. Cruse began the meeting by introducing those committee members present on the teleconference as well as two guests from the State of California. Ms. Jane Jensen and Mr. Fred Choske of the California Department of Health Services were present on the teleconference to discuss previously submitted suggested changes to Chapter 4 of the NELAC Standard.

SUGGESTED CHANGES TO CHAPTER 4

The suggested changes as received from the California Department of Health Services are shown in Attachment C. Those anticipated suggestions were additions and deletions to Sections 4.0, 4.1.2, and 4.1.4 concerning the primary and secondary accreditation requirements for noncontiguous laboratories and mobile laboratories. Section 4.0, paragraph a in the current accepted language states that "noncontiguous laboratory status shall be determined by the primary accrediting authority when noncontiguous facilities operate under the same ownership oversight, technical directorship, and quality system as the parent laboratory." The proposed comment from California concerning Section 4.0, paragraph a suggested the deletion of the term "ownership oversight." This was explained by Ms. Jensen by relating the situation in California where approximately half of the mobile laboratories with primary accreditation by the state are owned by one entity and the suggested addition of the term "technical director" would separate these mobile laboratories from being covered under one accreditation. Several members of the committee offered that the current wording allows for either ownership or technical directorship, the latter term having been proposed and accepted at the Sixth NELAC Annual meeting. The accreditation requirements of Section 4.0 for noncontiguous laboratories had been proposed and agreed upon by representatives of other state accreditation programs in previous NELAC meetings. The situation in California was not enough to sway the members of the committee, but the listing of multiple technical directors for noncontiguous laboratory facilities on the primary accreditation application was agreed upon as a possible concession by both the committee and the representatives of the California Department of Health Services. Further discussion of this issue will take place at the upcoming Sixth NELAC Interim Meeting (NELAC 6i).

In Section 4.0, paragraph a, the suggested addition of the wording "within the city limits or township where the laboratory is located" brought much discussion from members of the committee concerning past discussions on restricting the physical distances in proximity of

noncontiguous laboratories to their parent facility. The members of the committee that had participated in those past NELAC Accreditation Process Committee discussions pointed out that there was a hypothetical scenario for each possible restriction from audience members where some unfairness would occur when proximity restrictions were proposed. Ms. Jensen requested that the representatives from California reword these suggested changes to Section 4.0, paragraph a and present their ideas at NELAC 6i. Ms. Cruse then asked that the discussion move on to the suggested changes to Section 4.1.2 and 4.1.4 of the NELAC Standard.

The suggested language change to Sections 4.1.2 and 4.1.4 concerns the addition of an on-site assessment of, and the analysis of proficiency test (PT) samples by mobile laboratories doing business within the state of California. Ms. Jensen explained that the environmental effects on analytical equipment and conditions within each of these configured mobile laboratory units was an issue their state was compelled to monitor. These suggested changes require elements of a separate primary accreditation for mobile laboratories receiving and analyzing samples across state borders other than the state through which the mobile laboratory has primary accreditation. Ms. Cruse and Mr. Gleason Wheatley pointed out that neither Chapter 4, Chapter 3 nor Chapter 2 of the NELAC Standard requires separate on-site assessments or PT sample analysis by mobile laboratories seeking secondary accreditation and that changes of this magnitude require global changes to the currently accepted NELAC Standard. Ms. Jensen and Mr. Choske agreed that California would need to contact other NELAC Committees on this issue and would represent their views at NELAC 6i on this issue. Mr. Wheatley suggested the addition of the phrase "or analyzes samples from outside their state" as an addition to Section 4.0, paragraph c of the currently accepted language to require separate accreditation of mobile laboratories receiving samples from other states with which they have no accreditation. Ms. Susan Wyatt suggested that a similar change of wording to Section 4.0, paragraph b would be necessary for consistency where samples were being received across state borders in which the mobile laboratories are not currently accredited. This suggestion was late in the call but was very beneficial as the phrase ", or analyzes samples from outside of their state" inserted after the second word "operates" in paragraph b of Section 4.0 would streamline both paragraphs b and c into one requirement for noncontiguous and mobile laboratories. Ms. Cruse volunteered to draft language incorporating these suggestions for consideration by the members of the committee before the next scheduled teleconference.

ADJOURNMENT

After closing discussions and thanking the committee members and guests present, Ms. Cruse adjourned the meeting.

Attachment A

ACTION ITEMS
ACCREDITATION PROCESS COMMITTEE MEETING
OCTOBER 4, 2000

Item No.	Action	Date to be Completed
1.	Ms. Janet Cruse will draft modified language for Section 4.0 to address the concerns of the California Department of Health Services on secondary accreditation requirements for mobile laboratories.	10/18/00

Attachment B

PARTICIPANTS
ACCREDITATION PROCESS COMMITTEE MEETING
OCTOBER 4, 2000

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PROPOSED CHANGES TO CHAPTER 4

Section 4.0

a) An individual fixed-based laboratory requires a separate accreditation. The primary accrediting authority shall determine what constitutes an individual fixed-based laboratory when noncontiguous laboratory facilities :

1) operate under the same ~~ownership oversight~~ technical director within the city limits or township where the laboratory is located and quality system as the parent laboratory; and

2) operate for the purpose of providing additional capacity, or to reduce or eliminate sample contamination; and

3) receive samples only from and report raw analytical data only to the fixed-based laboratory for generation of the final report; and

4) are located such that the transport of samples to the noncontiguous laboratory facilities does not affect the quality of the analytical results.

b) The primary accrediting authority shall determine if a separate accreditation is required for a mobile laboratory that meets the description of a noncontiguous laboratory in section 4.0.a ~~that is owned by an accredited fixed-based laboratory, operates under the same quality system as the fixed-based laboratory~~, performs a subset of the analyses for which the fixed-based laboratory is accredited, and operates exclusively within the state in which the parent fixed-based laboratory is located.

c) ~~Separate accreditation by the primary accrediting authority is required for a~~ A mobile laboratory that meets the description of a noncontiguous laboratory in section 4.0.a ~~that is owned by an accredited fixed-based laboratory, operates under the same a quality system as the fixed-based laboratory~~, performs a subset of the analyses for which the fixed-based laboratory is accredited, and ~~operates~~ analyzes samples from outside of the state (in which the parent fixed-based laboratory is located) shall obtain a separate accreditation from the accrediting authority of each state from which samples are being analyzed.

d) Separate accreditation by the primary accrediting authority is required for a mobile laboratory that is owned by a fixed-based laboratory but operates under a different quality system, operate under a different technical director, or performs analyses for which the parent fixed-based laboratory is not accredited.

e) Separate accreditation by the primary accrediting authority is required for ~~a~~ each mobile laboratory that is not owned and operated by a fixed-based laboratory.

Section 4.1.2

b) A mobile laboratory, which is configured with equipment to perform analyses, whether associated with a fixed-based laboratory or not, is considered an environmental laboratory and ~~will require separate accreditation. This accreditation will remain with the mobile laboratory and~~

~~be site independent; moving the configured mobile laboratory to a different site will not require a new or separate accreditation.~~ requires a separate on-site assessment.

Section 4.1.4

a) Each laboratory seeking accreditation must receive, and analyze initial PT samples from a NELAP approved PT study provider for each field of testing (program-matrix-analyte) in which it is requesting accreditation. A mobile laboratory (whether associated with a fixed-based laboratory or not) shall meet all PT requirements for the field(s)of-testing performed by the mobile laboratory.

REASONS FOR CHANGES

Section 4.0.a: There are instances where numerous laboratories are owned by a single person or corporation throughout a State. If such laboratories were permitted to be under one accreditation, such accreditation would create numerous problems for the accrediting authority. Examples of a couple of possible problems are on-site assessments could encompass several hundred miles from one laboratory to another, and the accrediting authority would be seen as contributing or promoting unfair business practices. The change from “ownership oversight” to “technical director” and the additional clauses which identify noncontiguous facilities would be more appropriate and would clarify the noncontiguous terminology. The city limit and township requirement limits the distance of such noncontiguous laboratory facilities.

Section 4.0.b: This section has been changed to meet the changes to section 4.0.a.

Section 4.0.c: The primary accrediting authority would not necessarily be requiring a separate accreditation of a mobile laboratory under these conditions. The secondary accrediting authority would be more likely to be involved. Thus, “primary” was stricken and “shall obtain a separate accreditation from the accrediting authority of each state from which samples are being analyzed” has been entered in its place. A mobile laboratory under these conditions does not necessarily enter the boundaries of the State from which samples are being received. Thus, the phrase “analyzes samples from” has been suggested to replace “operates”.

Section 4.0.d: This section was changed to account for instances where one or more mobile laboratories have a different technical director under the same ownership.

Section 4.1.2.b: The language in this section must be retained to indicate that mobile laboratories are laboratories separate from any stationary facility. Due to the construction of mobile laboratories, environmental effects on analytical procedures are issues which cannot be overlooked. Separate assessments of the mobile laboratories are necessary to determine the testing capability of the laboratory.

Section 4.1.4.a: It is imperative that PT samples be analyzed by the mobile laboratory to show that such analyses can be carried out successfully. Due to environmental effects some of the mobile laboratories may not be able to successfully analyze particular samples. For accreditation purposes, this type of effect must be checked. Environmental effects could include contaminants, temperature variations, fluctuations in voltage/current supply, interference from improper grounding of equipment (RFI), stability of equipment after transportation, and particulate contamination effects on mechanical systems.